



U.S. Department
of Transportation
**Federal Aviation
Administration**

Western Pacific Region
American Samoa, Arizona, California, Guam,
Hawaii, Nevada

Airports Division
P.O. Box 92007
Los Angeles, California 90009

April 6, 2011

File Number: 2011WP810016

Mr. William Manning
Airport Manager
Mammoth-Yosemite Airport
HRC 79, Box 209
Mammoth Lakes, CA 93546

Dear Mr. Manning:

Mammoth-Yosemite Airport
Mammoth Lakes, CA

Warning Letter

14 Code of Federal Regulations (CFR) Part 139 Violation

On February 9, 2011 our office received information alleging that the Mammoth-Yosemite Airport (MMH) allowed air carrier operations to occur at the airport while failing to provide the minimum required Airport Rescue and Firefighting (ARFF) capability as specified by 14 CFR Part 139 and in the Mammoth-Yosemite Airport Certification Manual (ACM). The allegations indicated that the apparatus used to satisfy the requirements of the ARFF Index did not carry sufficient amounts of fire suppressing agent as required by Part 139, the airport failed to notify each air carrier as well as the Regional Airports Division Manager of the reduced ARFF capability and failed to disseminate that information through the Notice to Airman (NOTAM) system.

An investigation of the matter revealed that the airport allowed air carrier operations without the required amounts of fire suppressing agent specified in 14 CFR Part 139.317(i) Aircraft Rescue and Firefighting Equipment and Agents. The Regulation addresses aqueous film forming foam agent (AFFF) quantity requirements and dictates that "In addition to the quantity of water required, each vehicle required to carry AFFF must carry AFFF in an amount to mix with twice the water required to be carried by the vehicle."

FAA investigation revealed that the vehicle contained AFFF in an amount that satisfied the Airport Index requirement as specified by 14 CFR 139.317(b), Aircraft Rescue and Firefighting Equipment and Agents (1,500 gallons of water and the commensurate quantity of AFFF for foam production as specified for Index B airports), however, the vehicle did not contain AFFF in an amount required by the regulation "to mix with twice the water required to be carried by the vehicle." It appears that the airport was unaware of the regulatory requirement and believed that by satisfying the Index requirement they are satisfactory.

The investigation revealed that AFFF was depleted to an amount less than required by regulation following a FAA required live fire exercise conducted in late October of 2010. Due to an AFFF inventory oversight, some containers of AFFF thought to be available to replenish the vehicle were unavailable as they were discovered to be empty. As a result, the vehicle was filled to an amount of AFFF less than required by regulation but to a level satisfying the ARFF Index. The airport believed they were meeting the regulatory requirements.

During the course of our investigation ARFF personnel training records were evaluated and it was determined that the live-fire exercise conducted on the airport on October 28, 2010 to satisfy the annual live fire exercise did not provide the acceptable level of training dictated by the Administrator. To meet the annual requirement, Index A and B airport fire fighters may use a ground fire pit of an "appropriate size" and should be able to expose airport fire fighters to various types of aircraft fires (Engine fire, APU fire, Wheel well fire, etc.)

Considering the facts at hand the airport must take the following corrective actions:

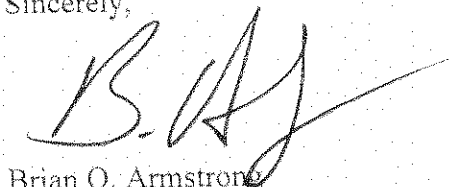
- 1) Ensure that in addition to the quantity of water required, each vehicle required to carry AFFF to satisfy the regulatory requirement of the airport must carry AFFF in an amount to mix with twice the water required to be carried by the vehicle as required by 14 CFR Part 139.117(i).
- 2) All airport fire fighters must receive an acceptable level of training that is approved by the administrator (i.e. attend an approved live-fire training facility or ground fire exercise).

It should be noted that corrective actions were taken by the airport as follows: A surveillance inspection conducted on February 28, 2011 indicates that corrective action item #1 was remedied on November 17, 2010. Correction Item #2, according to the airport, has been addressed as airport fire fighters are scheduled to attend an approved live-fire training facility on May 25, 2011.

In closing this case, we have given consideration to all available facts and have concluded the matter does not warrant legal enforcement. In lieu of such action, we are issuing this letter, which will be made a matter of record.

We will expect your future compliance with the regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Armstrong", with a long horizontal flourish extending to the right.

Brian Q. Armstrong
Manager, Safety and Standards Branch